

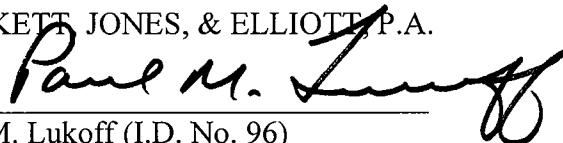
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AMPEX CORPORATION)
)
)
Plaintiff,)
)
v.) C.A. No. 04-1373 (KAJ)
)
)
EASTMAN KODAK COMPANY,)
ALTEK CORPORATION, and)
CHINON INDUSTRIES, INC.,)
)
Defendants)
)

**Defendants' Waiver of Right to File Opposition
to Plaintiff's Motion for Letter of Request**

Defendants Eastman Kodak Company, Altek Corporation and Chinon Industries, Inc., by and through counsel, and pursuant to Local Rule 7.1.2.(a), hereby notify the Court of their waiver of their right to file a brief, or otherwise oppose plaintiff's motion for a letter of request pursuant to the Hague Convention on the taking of evidence abroad in civil or commercial matters, which motion was filed on December 9, 2005.

PRICKETT JONES, & ELLIOTT, P.A.



Paul M. Lukoff (I.D. No. 96)
David E. Brand (I.D. No. 201)
1310 King Street
P.O. Box 1328
Wilmington, DE 19899
Attorneys for Defendants

OF COUNSEL:

S. Calvin Walden
WILMER CUTLER PICKERING
HALE AND DORR LLP
399 Park Avenue
New York, NY 10022
Tel: (212) 230-8800
Fax: (212) 230-8888

William F. Lee
Donald R. Steinberg
Michael J. Summersgill
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Tel: (617) 526-6000
Fax: (617) 526-5000

December 23, 2005

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of December 2005, I caused to be electronically filed Defendants' Waiver of Right to File Opposition to Plaintiff's Motion for Letter of Request with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Jack B. Blumenfeld
Morris, Nichols, Arsh & Tunnell
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899-1347

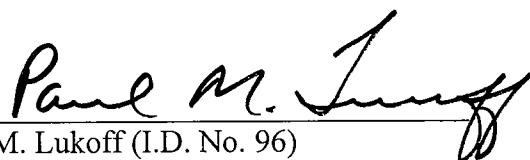
And that I caused copies to be served upon the following by Email and Federal Express:

Norman H. Beamer
Ropes & Gray LLP
525 University Avenue
Palo Alto, CA 94301

And that I caused copies to served upon the following by Email:

Jack B. Blumenfeld
Morris, Nichols, Arsh & Tunnell
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899-1347

Jesse J. Jenner
Ropes & Gray LLP
1251 Avenue of the Americas
New York, NY 10020



Paul M. Lukoff (I.D. No. 96)